## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

MARGARET CRAIG, as next of kin and personal representative of the estate of Angela Hulsey,	) )
or the setate of Angela Haloey,	, )
Plaintiff,	)
vs.	) No. 3:17-cv-01335
CHEATHAM COUNTY, TENNESSEE;	) ) JUDGE CAMPBELL
BEN MOORE; MARK BRYANT;	) MAGISTRATE JUDGE HOLMES
STEPHANIE GIZZI-BELL; JESSICA	)
PLANK; and JOHN DOES 1 and 2,	) JURY DEMAND
DESENDANTO	)
DEFENDANTS.	1

## MOTION

(TO AMEND COMPLAINT)

Comes the Plaintiff, pursuant to Rule 15 of the Federal Rules of Civil Procedure, and respectfully moves the Court for the entry of an order permitting amendment of the Plaintiff's complaint to add additional defendants, correct some minor typos, and to amend some of the factual paragraphs to conform to the addition of the new defendants. In support of this motion and pursuant to Local Rule 7.01, the Plaintiff has filed a memorandum and supporting exhibits contemporaneously with this Motion.<sup>1</sup>

Additionally, the proposed Amended Complaint is being filed as an exhibit and is incorporated herein by reference. Paragraphs 5.19, 5.20, and 5.23 were amended to replace Defendant Keith Rakes with Defendant Keith Pfeiffer due to the mistake in last names and add Defendant Harley Gerow as someone who a witness has identified as being present during one of Ms. Hulsey's seizures. New paragraphs 5.46 - 5.53 have been added based on the information obtained from discovery so far and include allegations of fraudulent concealment of the identifies of these new Defendants.

Respectfully submitted,

MOSELEY & MOSELEY ATTORNEYS AT LAW

BY: /s/ James Bryan Moseley
James Bryan Moseley, No. 021236
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 26<sup>th</sup> day of July, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties, if any, will be served separately. Parties may access this filing through the Court's electronic filing system.

Kelly M. Telfeyan, Esq. 424 Church St., Suite 800 Nashville, Tennessee 37219 Attorney for Defendant Cheatham County Robyn Williams, Esq. 211 Seventh Ave. N, Suite 500 Nashville, Tennessee 37219 Attorney for Individual County Defendants

Brent S. Usery, Esq. SPICER RUDSTROM, PLLC 414 Union Street, Suite 1700 Nashville, Tennessee 37219 Attorney for Defendant Plank

/s/ James Bryan Moseley
James Bryan Moseley

Copy to: Raymond T. Throckmorton, III, Esq.

Terrance E. McNabb, Esq.